

MEMO

To: ICCR Coordinating Committee Members
From: John A. Paul, Chair, ICCR Milestone Tracking Group
Subject: Source Workgroup Major Milestone Reports
Date: November 7, 1997

The ICCR Coordinating Committee, at its September, 1997 meeting, requested that each source work group: (1) review the schedule presented in Table 4 of the ICCR Document [i.e., Industrial Combustion Coordinated Rulemaking--Organizational Structure and Process (June, 1997, Revision 2)]; and (2) develop a "time line" for achieving the "major milestones" leading up to presentation of regulatory recommendations to the Coordinating Committee for review and discussion.

The Committee also established an ICCR Milestone Tracking Subgroup at the September meeting. The milestone tracking subgroup is a non-recommending subgroup, composed of the following Coordinating Committee members: John Paul, Rich Anderson, Fred Porter, Steve Gerritson, Bob Morris, and Miriam Lev-On. The subgroup was directed by the Committee to compile a tracking table which listed 5 to 6 major milestones from the ICCR document and then complete this table for each of the source work groups with dates for achieving these milestones based on the time lines developed by the source work groups. The time lines developed by each source work group were to be obtained from EPA and then used by the milestone tracking subgroup to complete a tracking table for each source work group.

Attached you will find the tracking tables. It should be noted that the EPA source work group co-chairs, in consultation with the source work group Stakeholder co-chairs and the members of the source work groups, generously volunteered their time and completed these tables for the milestone tracking subgroup, thus relieving the subgroup from the need to transfer information from the time lines developed by the source work groups to these tables.

It is recommended that each coordinating committee member review these tables, as time will be set aside at the November meeting in Houston for discussion of the tables. In your review, should you have any "clarification" questions, these can be presented to the appropriate source work group stakeholder co-chair or EPA co-chair prior to the Houston meeting. Additionally, should you have any question or comment on the format of the reports, please feel free to contact any member of the tracking subgroup.

We trust the coordinating committee members will find these milestone reports informative. See you in Houston!

MILESTONE TRACKING SUMMARY- IC Engines

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
<p>Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations</p>	<p>1/97-9/97</p>	<ul style="list-style-type: none"> - The Population Subgroup completed QA/QC efforts of the Inventory Database in August '97. - The Emissions Subgroup completed QA/QA efforts of the Emissions Database (of gathered reports) in July '97. Currently gathering additional test reports from state files and WG members which is expected to be completed by March '98. Final database will include emissions data of all testing conducted by the WG. Final emissions database is scheduled for completion in June '98. - Final test plan will be presented to the CC in November, '97. Testing site recommendations will be submitted in January '98.
<p>MACT Floor Determination Source Subcategorization Model Plant Development</p>	<p>9/97-11/97</p>	<ul style="list-style-type: none"> - The Population Subgroup developed potential subcategories for RICE in July '97. Preliminary subcategories as well as a preliminary MACT floor (existing sources) will be completed in the first quarter of '98. - Efforts in developing model plants have not been initiated. Model plant development will be initiated at the November meeting. Completion date is scheduled for February '98. - MACT Floor for new sources is scheduled for completion in August '98, subsequent to gathering additional source tests reports from state, WG members, and any WG testing efforts.

MILESTONE TRACKING SUMMARY- IC Engines

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	- The Emissions Subgroup developed a list of potential HAP reduction technologies (presented at the July '97 WG meeting.) Feasibility for such controls has yet to be initiated. - Final regulatory alternatives will be submitted in August '98.
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	- The WG has not assigned a task group to review Cost Analysis. - Cost analysis for existing and new sources will be completed in March '98. - Economic Analysis and Emission Reduction Assessment is scheduled for completion by November '98.
Preliminary Regulatory Recommendations	9/98	- Regulatory Recommendations have yet to be initiated. Efforts will be initiated in February '98. - Selection of Regulatory Alternatives will be completed by December '98.

¹ Major milestones are shown in bold type. Some recommended submilestones are also listed.

² Indicate the current status of the milestone (i.e., whether it has begun, is in data gathering stage, etc.), the expected date to complete the milestone, and, if appropriate, the group or subgroup responsible for completing the milestone.

MILESTONE TRACKING SUMMARY- Combustion Turbines

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
<p>Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations</p>	<p>1/97-9/97</p>	<ul style="list-style-type: none"> - The Database Enhancement Task Group completed QA/QC efforts of the Inventory Database in August '97. - The Testing Methods, monitoring, and Testing Task Group completed QA/QA efforts of the Emissions Database (of gathered reports) in August '97. Currently gathering additional test reports from state files and WG members which is expected to be completed by March '98. Final database will include emissions data of all testing conducted by the WG. Final emissions database is scheduled for completion in June '98. - Final list of HAPs to be measured will be submitted in November '97. Currently in the process of developing a test plan. Drafted a preliminary estimate of testing needs which will be revised subsequent to finalizing the test plan. Testing recommendations will be submitted in January '98.
<p>MACT Floor Determination Source Subcategorization Model Plant Development</p>	<p>9/97-11/97</p>	<ul style="list-style-type: none"> - The Subcategorization Task Group drafted a memorandum of potential subcategories in July '97. Final subcategories will be identified by November '97. - Initiated efforts in developing model plants. Identified a Model Plants Task Group during the WG's September meeting. Completion date is scheduled for February '98. - Initial MACT Floor for existing sources (using the current emissions database) is scheduled for completion in December '97 - MACT Floor for new sources is scheduled for completion in August '98, subsequent to gathering additional source tests reports from state, WG members, and any WG testing efforts.

MILESTONE TRACKING SUMMARY- Combustion Turbines

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	<ul style="list-style-type: none"> - The HAP Reduction Technology Task Group submitted a draft memorandum of Good Operating Practices in May '97. - A Technology Work Shop was held on July 25, 1997, to identify potential HAP control technologies. - An intermediate report listing HAP reduction and prevention technologies is scheduled for submittal in June '98. - Final regulatory alternatives will be submitted in August '98.
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	<ul style="list-style-type: none"> - The WG has not assigned a task group to review Cost Analyses. The WG initiated efforts in conducting literature searches of existing cost data of applicable controls. - Cost analysis for existing and new sources will be completed in March '98. - Economic Analysis and Emission Reduction Assessment is scheduled for completion by November '98.
Preliminary Regulatory Recommendations	9/98	<ul style="list-style-type: none"> - The HAPs vs. Criteria Task Group is in the process of identifying options for regulatory development. To date, no documentation has been drafted for regulatory options. The task group is gathering information of HAPs vs. Criteria emissions as a function of turbine operating parameters. - Selection of Regulatory Alternatives will be completed by December '98.

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MILESTONE TRACKING SUMMARY - Incinerators

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations	1/97-9/97	The IWG subteams are in various stages of data analysis. Some are hampered by lack of waste information that should become available with release of the corrected ICR results. All subteams expect to complete definition of subcategories, based on materials combusted, in January or February of 1998. Emission data collection and analysis will continue in parallel with the next steps throughout 1998.
MACT Floor Determination Source Subcategorization Model Plant Development	9/97-2/98	Source subcategorization by size, construction, or other characteristics and preliminary MACT floor determinations are expected by May of 1998 for most IWG subcategories. For a few subcategories, where test data is required, some delay beyond this timeframe is possible. For subcategories where the databases provide clear answers, and where technology will be the basis, the preliminary MACT floor determination may be completed in early 1998.
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	Preliminary regulatory alternatives for ICWI subcategories are expected in July 1998, in time for submission to the Coordinating Committee (CC) for review, prior to CC submittal to EPA in August. For other source categories, preliminary regulatory alternatives are expected in August 1998.

MILESTONE TRACKING SUMMARY - Incinerators

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	Regulatory analysis for ICWI subcategories should be completed by February 1999. Other subcategory analyses will follow 4-6 months later.
Preliminary Regulatory Recommendations	9/98	A draft proposal for submission to EPA is expected for ICWI subcategories in May 1999 and 4-6 months later for the other subcategories.

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² Indicate the current status of the milestone (i.e., whether it has begun, is in data gathering stage, etc.), the expected date to complete the milestone, and, if appropriate, the group or subgroup responsible for completing the milestone.

MILESTONE TRACKING SUMMARY- Boilers

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations	1/97-9/97	Has begun, expected completion date 2/98. (However, this milestone includes only review of inventory and emission databases, identification of data gaps, and recommendations for testing - results from test program are <u>not</u> expected before 8/98. Also does not include obtaining emission data from identified ICR respondents which would probably be in 4/98 timeframe.)
MACT Floor Determination Source Subcategorization Model Plant Development	9/97-11/97	Has begun, expected completion date for preliminary MACT floor is 1/98. Preliminary subcategories and preliminary model plants are currently being developed by each subgroup - expected completion date for these milestones is 12/97.
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	Not started, expected completion date 2/98.

MILESTONE TRACKING SUMMARY- Boilers

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	Not started, expected completion date for preliminary cost/environmental impacts - 4/98, expected completion date for preliminary economic impacts - 9/98.
Preliminary Regulatory Recommendations	9/98	Not started, expected completion date 10/98.

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MILESTONE TRACKING SUMMARY-Process Heaters (1 of 2)

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
		Indirect gas-fired units
Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations	1/97-9/97	1/98 -- Ongoing 1/98 -- The inventory database has been reviewed and the work group is awaiting the revised version for any further review necessary. The work group is also awaiting receipt of emissions database for review. N/A -- No emission test recommendations are expected.
MACT Floor Determination Source Subcategorization Model Plant Development	9/97-11/97	1/98 -- Ongoing 3/97 -- Subcategorization into gas- and other-fired units has been completed. No further subcategories are envisioned. 1/98 -- The determination of whether model plants are necessary is ongoing.
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	2/98 -- Ongoing 3/97 -- This determination has been completed (no control technology other than “good combustion practice” and NOx controls). 2/98 -- Determination of any “beyond the floor” alternatives is being explored by the “Good combustion practice” subgroup.

MILESTONE TRACKING SUMMARY-Process Heaters (1 of 2)

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
		Indirect gas-fired units
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	8/98 -- Not started
Preliminary Regulatory Recommendations	9/98	9/98 -- Not started

¹ Major milestones are shown in bold type. Some recommended submilestones are also listed.

² Indicate the current status of the milestone (i.e., whether it has begun, is in data gathering stage, etc.), the expected date to complete the milestone, and, if appropriate, the group or subgroup responsible for completing the milestone.

MILESTONE TRACKING SUMMARY-Process Heaters (2 of 2)

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
		Other-fired units
Information Collection Inventory Database QA/QC Review of ICCR Emissions Database Emission Testing Recommendations	1/97-9/97	2/98 -- Ongoing 1/98 -- The inventory database has been reviewed and the work group is awaiting the revised version for any further review necessary. The work group is also awaiting receipt of the emissions and ICR databases for review. 2/98 -- Any emission test recommendations are expected by 2/98.
MACT Floor Determination Source Subcategorization Model Plant Development	9/97-11/97	1/98 -- Ongoing 1/98 -- The work group is awaiting receipt of the ICR database. 1/98 -- The determination of whether model plants are necessary is ongoing.
Identification of Regulatory Alternatives Control Technology Assessment Identification of Beyond the Floor Alternatives	11/97-2/98	2/98 -- Ongoing 1/98 -- The control technology assessment is being evaluated by the "Good combustion practice" subgroup. 2/98 -- Determination of any "beyond the floor" alternatives is being explored by the "Good combustion practice" subgroup.

MILESTONE TRACKING SUMMARY-Process Heaters (2 of 2)

Milestone ¹	ICCR Document Milestone Schedule	Status with Schedule for Completion ²
		Other-fired units
Regulatory Analysis Cost Analysis Economic Analysis Emission Reduction Assessment	3/98-8/98	8/98 -- Not started
Preliminary Regulatory Recommendations	9/98	9/98 -- Not started

¹ Major milestones are shown in bold type. Some recommended submilestones are also listed.

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MILESTONE TRACKING SUMMARY-Process Heaters (2 of 2)

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